

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re: Equifax Inc. Customer Data Security Breach Litigation	MDL Docket No. 2800 No. 1:17-md-2800-TWT CONSUMER ACTIONS Chief Judge Thomas W. Thrash, Jr.  This document relates to: CONSUMER ACTIONS  <i>Drew Martin, et al v. Equifax, Inc. et al</i> No. 3:17-cv-00744-CWR-FKB
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**PLAINTIFFS' OBJECTION TO OPT-OUT DEADLINE**

COME NOW, the above-named Plaintiffs represented by Langston & Langston, PLLC and Bailey & Galyen, by and through undersigned counsel, hereby file their Objection to Opt-Out Deadline and would respectfully show the following:

1. On June 19, 2019, counsel for Plaintiffs were informed via e-mail that a settlement had been reached between leadership and the defendant, Equifax, Inc. Undersigned counsel for Plaintiffs obtained a copy of the proposed settlement.
2. The Order Directing Notice [#742] establishes an "opt-out deadline" of November 19, 2019, by which Plaintiff's may choose to forego inclusion in the settlement.

3. Undersigned counsel currently represents over 5,700 Plaintiffs in this litigation. It is impossible to adequately advise this large number of clients on the issue of accepting or rejecting the settlement in such a short time frame, especially when the relief to which they may be entitled is so unclear. An additional 60 days is needed so that Plaintiffs may make an informed decision whether to be included in the settlement class.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and their counsel respectfully object to the current opt-out deadline and request that this Court extend the opt-out deadline an additional 60 days so that Plaintiffs will have time to be adequately advised of the terms of the settlement before making a decision.

Respectfully submitted, this the 7<sup>th</sup> day of October, 2019.

/s/ C. Justin Broome  
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**STATEMENT OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared using 14-inch Times New Roman font, in accordance with LR 5.1C.

**CERTIFICATE OF SERVICE**

I hereby certify that on this date the foregoing document has been filed via the Courts CM/ECF filing system which will send notification of such filing to all counsel of record this 7<sup>th</sup> day of October, 2019.

/s/ C. Justin Broome  
C. Justin Broome, Esq.